

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

**Emilee Carpenter, LLC d/b/a  
Emilee Carpenter Photography  
and Emilee Carpenter,**  
Plaintiffs,

v.

**Letitia James**, in her official  
capacity as Attorney General of New  
York; **Jonathan J. Smith**, in his  
official capacity as Interim Commi-  
ssioner of the New York State  
Division of Human Rights; and  
**Weeden Wetmore**, in his official  
capacity as District Attorney of  
Chemung County,  
Defendants.

Case No. 6:21-CV-06303

**AMICI STATES' NOTICE OF  
PRO HAC VICE MOTION**

Please take notice that the States of Nebraska, Alabama, Arkansas, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Oklahoma, South Carolina, Texas, Utah, and West Virginia move this Court under Local Civil Rule 83.1(d) for an order granting *pro hac vice* admission to James A. Campbell for the purpose of representing the States in this case. The grounds for this request are included in the papers submitted herewith, which include the Petition for Attorney Admission, the Admission Sponsor Form, the Attorney's Oath, the Civility Principles Oath, and the Attorney Database and Electronic Case Filing Registration Form. Also submitted with this notice is a proposed order.

Date: June 4, 2021.

Respectfully submitted,

/s/Thomas Marcelle

Thomas Marcelle  
61 Devonshire Dr.  
Slingerlands, New York 12159  
tjmarccelle88@gmail.com

Douglas J. Peterson  
Attorney General of Nebraska  
David T. Bydalek  
Chief Deputy Attorney General  
James A. Campbell\*  
Solicitor General  
OFFICE OF THE NEBRASKA ATTORNEY  
GENERAL  
2115 State Capitol  
Lincoln, Nebraska 68509  
(402) 471-2682  
jim.campbell@nebraska.gov  
*Attorneys for Amici States*  
*\*Pro hac vice admission pending*

**Certificate of Service**

I certify that on June 4, 2021, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system and that all participants in the case are registered CM/ECF users and will be served by the CM/ECF system.

/s/Thomas Marcelle  
Thomas Marcelle